

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

JOHN D. LEE, JR., as )  
Special Administrator )  
of the Estate of CALEB )  
LEE, deceased, )  
Plaintiff, )

vs. )

TURN KEY HEALTH CLINICS, )  
WILLIAM COOPER, D.O., )  
JAMES CONSTANZER, APRN, )  
HOLLY MARTIN, APRN, )  
VIC REGALADO, in his )  
official capacity, )  
Defendants. )

Case No.  
19-CV-00318-GKF-JFJ

DEPOSITION OF  
JAWAUN LEWIS, D.O.

DATE: MAY 21, 2021

REPORTER: MARISA SPALDING, CSR, RPR

Spalding Reporting Service, Inc.  
1611 South Utica Avenue, Box 153  
Tulsa, Oklahoma 74104  
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1 Q Okay. And so what do you do next?

2 A So then I thought about my -- my mom,  
3 who lives in Tulsa, and we had recently lost a  
4 -- she lost her son, my brother, and so I  
5 thought it probably would be good for me to move  
6 back.

7 Q Okay. So it made sense for you from a  
8 family perspective?

9 A Yes.

10 Q Okay. When did you come to that  
11 determination after you had had this  
12 conversation with Junod?

13 A Afterwards, maybe about four or five  
14 days later.

15 Q Okay. What happens next?

16 MS. JETER: Object to form.

17 THE WITNESS: Next, I think we -- I  
18 don't remember if I came and had an interview,  
19 but I did have an interview I remember. I don't  
20 remember when. And I explored the opportunity,  
21 I liked it, and then we set up a start date.

22 Q (By Mr. Smolen) Okay. And do you  
23 recall what the start date was?

24 A I want to say December the 1st --

25 Q Okay.

1 A -- of 2016, roughly, at least.

2 Q And did you interview with Junod in  
3 person at -- when we're talking about after you  
4 had made the decision that it would work for you  
5 for personal reasons and for business reasons  
6 and you let Junod know that you're interested in  
7 the opportunity, did you meet with anybody other  
8 than Junod after that?

9 A I think I talked -- no, we just -- we  
10 had a phone interview.

11 Q Okay.

12 A It was a phone interview.

13 Q So I'm kind of interested. Was this a  
14 situation where you were going to be contractual  
15 again like you had been in Cleveland County?

16 A No, so Cleveland County was a -- just a  
17 contract provider for me to come in and treat  
18 their patients --

19 Q Okay.

20 A -- once a month. This was a full-time  
21 position.

22 Q Okay. You understood that this was  
23 going to be a full time -- they were going to be  
24 your employer?

25 A Correct.

1 Q (By Mr. Smolen) Did you ever do any  
2 independent research that led you to learning  
3 about that case as it pertained specifically to  
4 mental health or mental health breakdowns?

5 MS. JETER: Object to form.

6 THE WITNESS: No.

7 Q (By Mr. Smolen) Did -- do you recall if  
8 it was Junod who told you that there had been  
9 some previous issues with mental health delivery  
10 at the jail or if that was somebody else?

11 A I believe it was Junod.

12 Q Okay. Did he have -- at least based on  
13 your conversations with him, did he have a plan  
14 in place with how he wanted to address what he  
15 had observed as kind of some issues or  
16 historical issues?

17 MS. JETER: Object to form.

18 THE WITNESS: It sounded like on the  
19 phone that he was really interested in improving  
20 mental health care.

21 Q (By Mr. Smolen) Okay.

22 A He wanted a psychiatrist to come in and  
23 see what could be done.

24 Q Okay. So when you start, tell me what  
25 the actual work schedule is like.

1           A     8:00 to 5:00 or 7:00 to 3:00, Monday  
2 through Friday. Sometimes I would come in on  
3 weekends and catch up extra work.

4           Q     Okay. And were you responsible -- at  
5 least based on what your understanding was,  
6 okay, did you understand that you were  
7 responsible for supervising the mental health  
8 professionals that were at the jail? I mean,  
9 were you serving in a supervisory role?

10                   MS. JETER: Object to form.

11                   THE WITNESS: We have a -- a  
12 psychologist that supervises the mental health  
13 professionals.

14           Q     (By Mr. Smolen) Okay.

15           A     I was the only medical psych --  
16 psychiatrist at the time.

17           Q     Okay. And who did you report to when  
18 you started at the Tulsa County Jail? Who did  
19 you see as your direct supervisor?

20           A     Dr. Cooper.

21           Q     Okay. Had you worked with Dr. Cooper  
22 before?

23           A     No.

24           Q     Okay. Had you ever had interactions  
25 with Cooper just through being doctors in the

1 Q Okay. And had you worked on CorEMR  
2 before?

3 A No.

4 Q Okay. Do you recall there being any  
5 type of process where you either through a  
6 formal training or an informal training or you  
7 took it upon yourself to sit down and learn that  
8 system or was it a system maybe that you weren't  
9 familiar specifically with CorEMR but you were  
10 familiar with electronic medical records systems  
11 in the past so you were comfortable with it?

12 A Correct.

13 MS. JETER: Object to form.

14 Q (By Mr. Smolen) Okay. It might have  
15 had a different name from other medical systems  
16 that you've worked on, but it was familiar  
17 enough with you as far as an electronic medical  
18 record system that you were capable of operating  
19 within it?

20 A Yes.

21 Q Okay. You understood it was time  
22 stamped; that there would be time stamped  
23 entries; is that right?

24 A Yes.

25 Q Okay. How long do you serve in the

1 capacity as just the Tulsa County psychiatrist  
2 for the jail there under Turn Key?

3 A For -- I'm going to say over a  
4 year-and-a-half, two years.

5 Q Okay. So roughly a year-and-a-half, two  
6 year time frame --

7 A Yes.

8 Q -- you're serving in that capacity? And  
9 then what happens with that position or how do  
10 you -- what's your next position?

11 A They moved me up to psychiatric medical  
12 director.

13 Q Okay. Was there a psychiatric medical  
14 director at the time you started working at the  
15 Tulsa County Jail?

16 A No.

17 Q Okay. So it was a new position?

18 A Yes.

19 Q Okay. Were you involved in an  
20 administrative level with discussions  
21 surrounding the creation of that position?

22 A No.

23 Q Okay. Do you know how it was determined  
24 that Turn Key would create that position?

25 MS. JETER: Object to form.